

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHRISTOPHER ANAELE,)	
)	
<i>Plaintiff,</i>)	
-vs-)	No. 13-cv-_____
)	
CITY OF CHICAGO, ILLINOIS,)	<i>(jury demand)</i>
)	
<i>Defendant.</i>)	

COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under Title VII of the Civil Rights Act of 1964 as amended, 42 U.S.C. §2000e et seq. The jurisdiction of this Court is conferred by 42 U.S.C. §2000e-5(f)(3).
2. Plaintiff Christopher Anaele is a resident of the Northern District of Illinois. Plaintiff is a black male of Nigerian origin and is over the age of 40.
3. Defendant City of Chicago hired plaintiff in April of 1991; defendant continuously employed plaintiff until it discharged him on July 24, 2012.
4. At the time of his discharge, plaintiff was employed as a subpoena officer for the Independent Police Review Authority ("IPRA") of the City of Chicago.

5. Starting in 2010, and continuing on and after the date of plaintiff's termination, the Chief Administrator of IPRA applied a policy of replacing minority and older employees with younger, white employees. The Administrator implemented this policy by (1) discharging minority and older employees for pretextual reasons, and (2) by making the working conditions of other minority and older employees intolerable, thereby forcing them to resign. Plaintiff was a victim of this discriminatory policy.

6. In 2011, plaintiff filed several complaints of discrimination about the above described policies with the Illinois Human Rights Commission.

7. Defendant discharged plaintiff on July 24, 2012 as part of the above described policies or, in the alternative, in retaliation for having complained about the above described policies.

8. Plaintiff filed a timely charge of employment discrimination with the Equal Employment Opportunity Commission and brings this action within 90 days of receipt of his notice of right to sue.

9. As a result of the foregoing, plaintiff was deprived of equal employment opportunities, lost wages, and suffered severe emotional distress.

10. Plaintiff hereby demands trial by jury.

WHEREFORE plaintiff requests that the Court order his reinstatement with full backpay and benefits, and that judgment be entered in his favor and against the City of Chicago in the amount of three hundred thousand dollars and that the costs of this action, including attorney's fees, be taxed against defendant.

/s/ Kenneth N. Flaxman
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